

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
LIVINGSCAPES, LLC) Case No. 3:20-bk-03561
) Chapter 11
) Judge Harrison
)
Debtor.)

**EXPEDITED APPLICATION FOR CONDITIONAL APPROVAL OF
DISCLOSURE STATEMENT AND TO COMBINE HEARINGS ON DISCLOSURE
STATEMENT AND CONFIRMATION OF THE PLAN**

Livingscapes, LLC (“Debtor”) hereby applies to the Court, pursuant to 11 U.S.C. § 1125(f)(3), Rule 3017.1, FRBP and Rule 3017-2, LRC, for conditional approval of the Debtor’s Disclosure Statement, and further, for the combining of the hearings on the final approval of the Disclosure Statement, and the confirmation of the Plan of Reorganization (the “Plan”). In support of this application, Debtor states as follows.

1. On July 29, 2020 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. The Debtor filed its Plan on August 20, 2021.
3. The Debtor has filed a Disclosure Statement with its Plan.
4. 11 U.S.C. § 1125(f)(3) of the Bankruptcy Code provides that the Court may conditionally approve a Disclosure Statement subject to final approval after notice and a hearing and also that a hearing on the Disclosure Statement may be combined with the hearing on confirmation of a Plan.
5. Conditionally approving the Debtor’s Disclosure Statement and combining the

the best interests of the Debtor and its creditors.

6. The provisions of 11 U.S.C. § 1125(f)(3)(B) are clear that “a conditionally approved Disclosure Statement shall be mailed not later than twenty-five days before the date of the hearing on confirmation of the Plan.” Immediate entry of this order is necessary in order that Debtor complies with the notice requirements. Debtor requests the hearing on the approval of the disclosure statement and confirmation of the plan be scheduled for the next available date after the twenty-five day notice period, at 9:00 a.m. at the U.S. Bankruptcy Court for the Middle District of Tennessee, Courtroom 3, 2nd Floor Customs House, 701 Broadway, Nashville, TN 37203.

7. No hearing on this Expedited Application is required. No party is prejudiced by the requested relief as all parties have adequate notice to respond to any substantive issues relevant to the Disclosure Statement and Plan.

WHEREFORE, the Debtor moves the relief requested.

Respectfully submitted,

/s/ STEVEN L. LEFKOVITZ
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CERTIFICATE OF SERVICE

A true and exact copy of the foregoing has been sent to the Assistant U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, Tennessee 37203 and to all other Creditors and Parties of Interest via the U.S. Bankruptcy Court’s Electronic Filing System on the 20th day of August 2021.

/s/ Steven L. Lefkovitz